

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re:)	Chapter 11
)	
Squirrels Research Labs LLC <i>et al.</i> , ¹)	Case No. 21-61491
)	(Jointly Administered)
Debtors.)	
)	Judge Russ Kendig
)	
<hr style="border: 0.5px solid black;"/>		
Squirrels Research Labs, LLC,)	
)	
Plaintiff,)	<u>NOTICE OF WITHDRAWAL OF</u>
)	<u>AMENDED ANSWER TO</u>
vs.)	<u>COUNTERCLAIM</u>
)	
Fleur-de-Lis-Development, LLC, <i>et. al.</i> ²)	
)	
Defendants.)	
)	
<hr style="border: 0.5px solid black;"/>		

Now comes Nicholas Capotosto, counsel to Squirrels Research Laboratories, LLC and hereby gives notice to this Court of the withdrawal of the Amended Answer to Counterclaim. The Amended Answer to Counterclaim was inadvertently filed in the general case (21-61491) and was intended to be filed in the Adversary Proceeding Case No. 22-6003. Accordingly, Squirrels withdraws the filing in this matter and will re-file the Amended Answer to Counterclaim in the Adversary Proceeding.

Dated: April 27, 2022

Respectfully submitted,

/s/ Nicholas P. Capotosto

Marc B. Merklin (0018195)

Julie K. Zurn (0066391)

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Squirrels Research Labs LLC (9310), case no. 21-61491 and The Midwest Data Company LLC (1213), case no. 21-61492.

² The other defendants are Rocco Piacentino and Cynthia Heinz.

Nicholas P. Capotosto (0076436)
BROUSE McDOWELL, LPA
388 S. Main Street, Suite 500
Akron, Ohio 44311
Telephone: (330) 535-5711
Facsimile: (330) 253-8601
mmerklin@brouse.com
jzurn@brouse.com
ncapotosto@brouse.com

*Counsel for the Debtors
and Debtors-in-Possession*

CERTIFICATE OF SERVICE

I, Nicholas P. Capotosto, hereby certify that on April 27, 2022, a true and correct copy of the *Notice of Withdrawal of Amended Answer to Counterclaim* was served via the court's Electronic Case Filing System on these entities and individual who are listed on the court's Electronic Mail Notice List:

John C. Cannizzaro on behalf of Interested Party Instantiation LLC at
John.Cannizzaro@icemiller.com, lauren.prohaska@icemiller.com

Christopher Paul Combest on behalf of Creditor Avnet, Inc. at
christopher.combest@quarles.com

John G. Farnan on behalf of Creditor Cincinnati Insurance Company at
jfarnan@westonhurd.com

Robert E. Goff, Jr. on behalf of Creditor Cincinnati Insurance Company at
rgoff@westonhurd.com, jroberts@westonhurd.com

Steven Heimberger on behalf of Interested Party SCEB, LLC at sheimberger@rlblp.com,
HeimbergerSR82735@notify.bestcase.com

Jeannie Kim on behalf of Interested Party Instantiation LLC at
JeKim@sheppardmullin.com, dgatmen@sheppardmullin.com

Marc Merklin on behalf of Debtor Squirrels Research Labs LLC at
mmerklin@brouse.com, tpalcic@brouse.com; mmiller@brouse.com

David M. Neumann on behalf of Creditor Envista Forensics, LLC d/b/a AREPA
dneumann@meyersroman.com, jray@meyersroman.com;mnnowak@meyersroman.com

David M. Neumann on behalf of Creditor Torea Consulting Ltd. at
dneumann@meyersroman.com, jray@meyersroman.com;mnnowak@meyersroman.com

Christopher Niekamp on behalf of Creditor Better PC, LLC at cniekamp@bdblawn.com

Paul J. Schumacher on behalf of Interested Party Ohio Power Company dba American
Electric Power at pschumacher@dmclaw.com, tgross@dmclaw.com

Frederic P. Schwieg at fschwieg@schwieglaw.com

Frederic P. Schwieg on behalf of Trustee Frederic P. Schwieg at
fschwieg@schwieglaw.com

Bryan Sisto on behalf of Creditor Carl Forsell at bsisto@fbtlaw.com

Richard J. Thomas on behalf of Creditor Premier Bank at
rthomas@hendersoncovington.com, dciamboti@hendersoncovington.com

Joshua Ryan Vaughan on behalf of Creditor Ohio Bureau of Workers Compensation at
jvaughan@amer-collect.com, SAllman@AMER-COLLECT.COM;HouliECF@aol.com

Julie K. Zurn on behalf of Debtor Squirrels Research Labs LLC at
jzurn@brouse.com, tpalcic@brouse.com

Kate M. Bradley ust44 on behalf of U.S. Trustee United States Trustee at
kate.m.bradley@usdoj.gov

And by regular U.S. Mail on April 27, 2022, on the following:

Instantiation LLC
c/o Jason R. Schendel
Sheppard, Mullin, Richter & Hampton LLP
4 Embarcadero Center, 17th Flr
San Francisco, CA 94111

/s/ Nicholas P. Capotosto
Nicholas P. Capotosto (0076436)
BROUSE McDOWELL, L.P.A.
388 S. Main Street, Suite 500
Akron, Ohio 44311-4407
(330) 535-5711
ncapotosto@brouse.com